

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

MAY 22 2024

U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,)	
)	
v.)	NO. 1:24-cr-00090-TWP-MJD
)	
KRISTOPHER McDONALD,)	
a/k/a Barone Santiago,)	
a/k/a Solja,)	
)	
Defendant,)	

INDICTMENT

COUNT ONE

**[Sex Trafficking by Force, Fraud, or Coercion] –
18 U.S.C. §§ 1591(a)(1) and (b)(1)]**

The Grand Jury charges that:

Beginning at least as early as August 1, 2023, the exact date being unknown to the Grand Jury, and continuing until on or about October 11, 2023, within the Southern District of Indiana, Indianapolis Division, and elsewhere, KRISTOPHER McDONALD, a/k/a Barone Santiago, a/k/a Solja, in and affecting interstate and foreign commerce, did knowingly entice, harbor, transport, provide, advertise, and maintain by any means a person known to the Grand Jury (“Individual #1”), knowing that means of force, threats of force, fraud, and coercion, would be used to cause person or persons to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT TWO

**[Sex Trafficking by Force, Fraud, or Coercion] –
18 U.S.C. §§ 1591(a)(1) and (b)(1)]**

The Grand Jury charges that:

Beginning on or about July 9, 2023, the exact date being unknown to the Grand Jury, and continuing until on or about October 11, 2023, within the Southern District of Indiana, Indianapolis Division, and elsewhere, KRISTOPHER McDONALD, a/k/a Barone Santiago, a/k/a Solja, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means a person known to the Grand Jury (“Individual #2”), knowing that means of force, threats of force, and coercion, would be used to cause person or persons to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT THREE

[Enticing an Individual to Travel in Interstate Commerce to Engage in Prostitution – 18 U.S.C. § 2422(a)]

On or about August 5, 2023, in the Southern District of Indiana, Indianapolis Division, KRISTOPHER McDONALD, a/k/a Barone Santiago, did knowingly persuade, induce, and entice an individual to travel in interstate commerce to engage in prostitution; to-wit, McDONALD persuaded, induced, and enticed Individual #1 to fly from Gulfport, Mississippi to Indianapolis, Indiana to engage in prostitution.

All in violation of Title 18, United States Code, Section 2422(a).

COUNT FOUR

[Travel Act – 18 U.S.C. § 1952(a)(3)]

On or about August 15, 2023, in the Southern District of Indiana, Indianapolis Division, and elsewhere, KRISTOPHER McDONALD, a/k/a Barone Santiago, used a facility in interstate commerce to promote unlawful activity, and thereafter attempted to perform an act to promote and manage such unlawful activity; to-wit, McDONALD transferred \$40 to an individual known to the Grand Jury (“Individual #3”) via CashApp so that Individual #3 could purchase gasoline to drive to and from Fairfield, Ohio to Indianapolis, Indiana to engage in prostitution activity, in violation of Indiana Criminal Code 35-45-4-2(a)(1) and Title 29, Ohio Revised Code, Section 2907.25(A), and subsequently attempted to promote and manage the prostitution activity of Individual #3.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT FIVE

[Travel Act – 18 U.S.C. § 1952(a)(3)]

On or about August 16, 2023, in the Southern District of Indiana, Indianapolis Division, and elsewhere, KRISTOPHER McDONALD, a/k/a Barone Santiago, used a facility in interstate commerce to promote unlawful activity, and thereafter attempted to perform an act to promote and manage such unlawful activity; to-wit, McDONALD transferred \$20 to Individual #3 via CashApp so that Individual #3 could purchase gasoline to drive to and from Fairfield, Ohio to Indianapolis, Indiana to engage in prostitution activity, in violation of Indiana Criminal Code 35-45-4-2(a)(1) and Title 29, Ohio Revised Code, Section 2907.25(A), and subsequently attempted to promote and manage the prostitution activity of Individual #3.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT SIX

**[Possession of a Firearm by a Convicted Felon –
18 U.S.C. § 922(g)(1)]**

The Grand Jury charges that:

On or about October 11, 2023, within the Southern District of Indiana, Indianapolis Division, KRISTOPHER McDONALD, a/k/a Barone Santiago, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm; to-wit, McDONALD possessed one .40 caliber Glock Model 23 handgun, bearing serial number

WKK960, after knowingly having sustained a conviction for the offense of Aggravated Assault, a 2nd degree felony, in Harris County, Texas, on or about July 13, 2011.

All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

1. The allegations in Counts One through Six of this Indictment are realleged as if fully set forth here, for the purpose of giving the defendants notice of the United States' intent to seek forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

2. If convicted of the offenses set forth in Counts One through Six of this Indictment, KRISTOPHER McDONALD shall forfeit to the United States any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses of which he or she is convicted, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses of which he is convicted.

3. If convicted of the offenses set forth in Counts One through Six of this Indictment, KRISTOPHER McDONALD shall also forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any of the offenses of which he is convicted.

A TRUE BILL:



FOREPERSON

ZACHARY A. MYERS
United States Attorney

By:

A handwritten signature in blue ink, appearing to read 'B. A. Blackington', written over a horizontal line.

Bradley A. Blackington
Assistant United States Attorney